

**TORRES | TORRES STALLINGS
A LAW CORPORATION**

David A. Torres, SBN135059
1318 K. Street
Bakersfield, CA 93301
Tel: (661)326-0857
Email: dtorres@lawtorres.com

Attorney for:
HEATHER STANLEY

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HEATHER STANLEY,

Defendants.

Case No. 1:20-CR-00045-JLT-SKO

**STIPULATION REQUESTING
EXTENSION OF SURRENDER DATE**

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT, HONORABLE JUDGE
JENNIFER L. THURSTON; ASSISTANT UNITED STATES ATTORNEY, JOSEPH
BARTON; UNITED STATES PROBATION OFFICER, MEGAN D. PASCUAL

IT IS HEREBY STIPULATED by the following parties that the current date of
surrender, October 4, 2024, of Defendant, HEATHER STANLEY, be extended to January 31,
2025.

The government has agreed to stipulate to this request, so long as this is a one-time
request by Defendant, HEATHER STANLEY.

Parties agree that in the event of an additional request by Defendant, HEATHER
STANLEY, the Court will reject the additional request. Defense counsel understands the
government's position.

Defendant, HEATHER STANLEY, is seeking an extension of surrender date for the

following reasons:

1. Ms. Stanley needs to undergo a diagnostic mammogram and an ultrasound due to a previous mammogram report indicating an “asymmetry” was detected. Ms. Stanley will need further diagnostic testing and treatment for her developing cyst, which she will be receiving at Johns Hopkins Medicine. (See, Exhibit A.)
2. Ms. Stanley is due for a trachea procedure as a result of her condition of Idiopathic Subglottic Stenosis (ISGS), a condition which causes her scar tissue to build up in her subglottic and trachea. (See, Exhibit B.)
3. Ms. Stanley has mandatory post-surgery appointments and treatments with San Diego Podiatry Group to ensure she is healing properly from her foot reconstruction surgery. (See, Exhibit C.)

IT IS SO STIPULATED.

DATED: October 1, 2024

Respectfully Submitted,

/s/ David A Torres

DAVID A. TORRES

Attorney for Defendant

HEATHER STANLEY

DATED: October 1, 2024

/s/Jospeh Barton

JOSPEH BARTON

Assistant U.S. Attorney

ORDER

Based upon the information continued in the stipulation and the agreement of the parties, the surrender date be extended from October 4, 2024, to January 31, 2025.

IT IS SO ORDERED.

Dated: **October 2, 2024**


UNITED STATES DISTRICT JUDGE